PRC Environmental Management, Inc.
644 Linn Street
Suite 719
Cincinnati, Ohio 45203
513-241-0149
Fax 513-241-0354

May 6, 1992

Ms. Jeanne Griffin
Work Assignment Manager (HSM-5J)
U.S. Environmental Protection Agency
77 West Jackson Blvd.
Chicago, IL 60604

Re: Expanded Site Investigation - Carstab Corporation (Morton International, Inc.)
OHD 000724138

Dear Ms. Griffin:

The purpose of this letter is to provide a brief update of the status of the Expanded Site Investigation (ESI) being performed by PRC Environmental Management, Inc. (PRC), at the Carstab site in Reading, Ohio.

The Carstab site, currently operated by Morton International, Inc. (Morton), has been under investigation since 1979. However, the Screening Site Inspection (1990) and subsequent investigation by the Technical Assistance Team (1991) did not effectively attribute contamination to the Carstab site due to the lack of appropriate background sample locations. In addition, source areas on the Carstab site are somewhat poorly defined. Several other known and suspected off-site source areas adjacent to the Carstab facility have complicated the investigation. These include the Pristine Superfund site (currently in the remedial design/remedial action phase), Cincinnati Drum, Inc., and the General Electric - Evendale Facility (which includes former Air Force Plant 36).

The City of Reading municipal wellfields are within 1/4 mile of suspected source areas on the Carstab site. Several of these wells have been closed due to contamination suspected to have originated at Pristine and GE. Ground-water data obtained during the file search for the Carstab ESI do not indicate a correlation between the contaminants in the Reading wells and contaminants detected in shallow ground water at Carstab. Presently, the Ohio Environmental Protection Agency (OEPA) does not intend to renew Reading's permit for their ground-water treatment system (aerator); thus, it is likely that Reading will be forced to close the wellfields. If this occurs, Reading will begin using water supplied by the City of Cincinnati. City of Reading legal counsel are deciding whether to appeal the OEPA decision or to close the wellfields.

PRC has reviewed available file information and historic aerial photographs for the Carstab site. PRC has also reviewed the 1987 Addendum to the Remedial Investigation Report for the Pristine site, which contains pertinent hydrogeologic and ground-water quality data, and has requested a copy of the Pristine Remedial Design/Remedial Action Plan. According to Mr. Tom Alclo, the U.S. EPA Remedial Project Manager for the Pristine site, more extensive hydrogeologic studies are scheduled for the Pristine site this summer, and ground-water data from this investigation will be available to PRC. This data will help assess background conditions, as some of the wells on the Pristine and Cincinnati Drum sites appear to be upgradient from Carstab. Mr. Alclo did not feel that attempting to gain access to the Cincinnati Drum and Pristine sites during the Carstab investigation would be prudent, due to the history of legal difficulties with the property owners and the potential to jeopardize the current cooperative atmosphere.

The site reconnaissance visit at Carstab was performed on March 10, 1992. Morton personnel have cooperated with the investigation to date and have indicated that they would allow sample collection, with the stipulation that all samples be split. Morton's legal counsel will need

to approve the installation of new ground-water monitoring wells, which will be necessary due to the lack of adequate background wells and poor condition of some existing wells. However, Morton personnel did not indicate that they would try to impede the investigation.

The preliminary assessment for the Carstab site indicates a high score for the ground-water pathway (100) due to the proximity of and population served by the Reading wells. However, projected HRS II scores for the ground-water pathway vary considerably based on the toxicity of the contaminants that may be present on site. Because of this, the final site HRS score may be less than 28.5. The projected ground-water pathway score may also be lowered if the Reading wells are closed (thereby reducing the target population) and the results of the ESI do not indicate a correlation between contaminants in shallow ground water at Carstab and contaminants in the Reading wells. Ground-water to surface water discharge is also a concern; however, the surface water pathway does not result in a high score, as Mill Creek is not used for drinking water and has been subject to extensive pollution from industrial sources upstream and downstream from Carstab. Projected scores for the air and soil migration pathways are also low, as the suspected source areas are buried or paved, and are located within the fenced portion of the site.

PRC is currently completing a draft of the ESI Site Specific Implementation Plan (SSIP). The field investigation will concentrate on (1) detection of releases to shallow ground water through the use of a Geoprobe™ and the installation/ sampling of monitoring wells; (2) source characterization through soil borings, sampling and analyses; (3) evaluation of on-site and off-site background conditions; and (4) evaluation of the potential discharge of contaminated ground water to Mill Creek through collection and analysis of sediment samples. PRC anticipates submitting the ESI-SSIP by May 15.

If you have any questions please call me at (513) 241-0149.

Sincerely,

Guy D. Montfort
Geologist

Enclosure
cc: Laura Fay, OEPA
Amy Gibbons, OEPA Southwest District Office
Scott Engle, PRC - Cincinnati
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